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December 26, 2022

Via Electronic Filing

The Honorable Taryn A. Merkl, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Ramos v. City Wav Corp. et al*
Case No.: 22-cv-990

Dear Honorable Magistrate Judge Merkl:

This law firm represents Plaintiffs Jose Ramos, Makhinbonu Narzullaeva and Javohir Juraev (collectively, the “Plaintiffs”) in the above-referenced action.

Pursuant to Your Honor’s December 2, 2022 Status Report Order this letter respectfully serves to provide the Court with a status report in the above-referenced action.

The undersigned counsel has finalized service on individual defendants Vadim Kulishevskiy and Ronald Ogrady. [See Dckt. Nos. 29, 30]. The undersigned counsel is attempting to exhaust efforts to have Defendants voluntarily appear in the action, before proceeding with the filing of an application for a clerk’s certificate of default judgment, and eventually, of a motion for default judgment.

The undersigned anticipates being in a position to proceed with the filing of an application or a clerk’s certificate of default judgment, in the event of Defendants continued non-appearance, on or before January 13, 2023.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

Thank you, in advance, for your time and consideration.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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